

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 1:12-CR-71
	§	
MARIO CARDENAS-GUILLEN	§	

MOTION FOR FINAL ORDER OF FORFEITURE

The United States of America, by its undersigned counsel, respectfully submits its Motion for Final Order of Forfeiture in the above-entitled case, and in support thereof would show the following:

1. On January 11, 2023, this Court entered a Preliminary Order of Forfeiture pursuant to the provisions of 21 U.S.C. § 853, forfeiting to the United States the sum of \$10,000,000.00 and all interest and proceeds traceable thereto, representing the amount of proceeds obtained by the defendant as a result of the offense alleged in the Count One of the indictment, which charges violations of 21 U.S.C. § 846, conspiracy to distribute and possess with the intent to distribute 5 kilograms or more of a Schedule II controlled substance, cocaine HCL, for which the defendant is personally liable.

2. The entry of a final order of forfeiture is specifically authorized by Rule 32.2(b)(1) and (c)(1) of the Federal Rules of Criminal Procedure and is requested as part of the present motion. Once the final order of forfeiture is entered, the United States may move at any time, pursuant to Fed. R. Crim. P. 32.2(e)(1)(B), to amend the order to

forfeit specific property of the defendant, having a value up to the \$10,000,000.00 in cash proceeds, as substitute assets.

3. By virtue of the plea agreement and the determination of the amount of the money derived from the offense for which the defendant has been convicted, a final order should be entered against the defendant.

4. The government respectfully requests a final order of forfeiture as to the defendant, Mario Cardenas-Guillen, as proposed in the attached order, which shall be made part of the defendant's sentence and included in the judgment, pursuant to Fed.R.Crim.P. 32.2(b)(4).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing instrument has been served on counsel for the defendant via the Court's CM/ECF filing system on December 19, 2023.

/s/ Christopher T. Rapp
CHRISTOPHER T. RAPP

CERTIFICATE OF CONFERENCE

I have conferred with counsel of record for defendant regarding the merits of this motion. The motion is UNOPPOSED.

/s/ Christopher T. Rapp
CHRISTOPHER T. RAPP